

EXHIBIT A

SUPER LAW GROUP, LLC

December 21, 2023

Via Certified Mail, Return Receipt Requested

Royal Coach Lines, LLC C/O CT Corporation System 28 Liberty Street New York, NY 10005	Steven DiPaolo , President & CEO Royal Coach Lines, LLC Royal Coach Lines, Inc. 1010 Nepperhan Avenue Yonkers, NY 10703
Ralph Colabello, Jr. , Vice President Royal Coach Lines, LLC Royal Coach Lines, Inc. 1010 Nepperhan Avenue Yonkers, NY 10703	James Lisciandrello , General Manager Royal Coach Lines, LLC Royal Coach Lines, Inc. 1010 Nepperhan Avenue Yonkers, NY 10703
Royal Coach Lines, LLC Royal Coach Lines, Inc. 870 Nepperhan Avenue Yonkers, NY, 10703	Eddie Colone , Terminal Manager/ Dispatcher (or current Manager) Royal Coach Lines, LLC Royal Coach Lines, Inc. 2260 Saw Mill River Road Elmsford, NY 10523
Ibette Rodriguez , Terminal Manager/ Dispatcher (or current Manager) Royal Coach Lines, LLC Royal Coach Lines, Inc. 475 W Hartsdale Avenue Hartsdale, NY 10830	Angel Valencia , Head Dispatcher (or current Manager) Royal Coach Lines, LLC Royal Coach Lines, Inc. 51 NY-100 Briarcliff Manor, NY 10510
Blasina Silva , Safety Director (or current Manager/ Director) Royal Coach Lines, LLC Royal Coach Lines, Inc. 120 Primrose Street Lincolndale, NY 10594	Anthony Dellicurti , Terminal Manager/ Dispatcher (or current Manager) Royal Coach Lines, LLC Royal Coach Lines, Inc. 924 Broadway Thornwood, NY 10594

Re: Notice of Violation and Intent to File Suit under the Clean Water Act

Dear above-named individuals and addressees,

We are writing on behalf of Riverkeeper, Inc. (“Riverkeeper”),¹ to notify you of Riverkeeper’s intent to file suit against Royal Coach Lines, LLC; Royal Coach Lines, Inc.;² and Steven DiPaolo (“Royal Coach” or “RC”), pursuant to Section 505(a) of the federal Clean Water Act³ for violations of the Clean Water Act.

Riverkeeper intends to file suit, as an organization and on behalf of its adversely affected members, in the United States District Court for the Southern District of New York seeking appropriate equitable relief, civil penalties, and other relief no earlier than 60 days from the postmark date of this letter.⁴

Riverkeeper intends to take legal action because Royal Coach is discharging polluted stormwater⁵ from its vehicle and equipment maintenance facilities (“RC Facilities”):

- 1010 Nepperhan Ave., Yonkers, NY 10703 (“RC Corporate Facility”);
- 870 Nepperhan Ave., Yonkers, NY, 10703 (“870 Nepperhan Facility”);
- 51 NY-100, Briarcliff Manor, NY 10510 (“Ossining Facility”);
- 120 Primrose St., Lincolndale, NY 10594 (“Somers Facility”);
- 2260 Saw Mill River Rd., Elmsford, NY 10523 (“Elmsford Facility”);
- 924 Broadway, Thornwood, NY 10594 (“Thornwood Facility”);
- 1228 Saw Mill River Rd., Yonkers, NY 10710 (“1228 SMRR Facility”); and
- 475 W Hartsdale Ave., Hartsdale NY, 10530 (“Greenburgh Facility”).

Royal Coach is discharging polluted stormwater from the RC Facilities to the waters of the United States—specifically the Saw Mill River, the Pocantico River, the Plum Brook, and the Rum Brook, all of which are tributaries to the Hudson River—without permits in violation of Clean Water Act Sections 301(a) and 402(p).⁶ Further, Royal Coach has not applied for coverage under, nor complied with the conditions of, individual National Pollutant Discharge Elimination System (“NPDES”) permits or the Multi-Sector General Permit for the Discharge of

¹ Riverkeeper, Inc. is a not-for-profit environmental organization existing under the laws of the state of New York, headquartered in Ossining, New York. Riverkeeper’s mission includes safeguarding the environmental, recreational, and commercial integrity of the Hudson River and its ecosystem, as well as the watersheds that provide New York City with its drinking water. Riverkeeper achieves its mission through public education, advocacy for sound public policies, and participation in legal and administrative forums. Riverkeeper has more than 3,800 members, many of whom reside near to, use, and enjoy the Hudson River and the waters and tributaries of the Hudson River and New York Harbor, including the Saw Mill River, the Pocantico River, the Plum Brook, and the Rum Brook.

² Riverkeeper is aware that Royal Coach Lines, Inc. indicated in public filings that it merged with Royal Coach Lines, LLC, and has been inactive since August 30, 2023. Please contact the undersigned attorney with documents to verify that Royal Coach Lines, Inc. is not an active corporation.

³ 33 U.S.C. § 1365(a). We refer to statutory provisions by their section in the Clean Water Act and provide the parallel citation to the United States Code only on first reference.

⁴ See 40 C.F.R. § 135.2(a)(3)(c) (notice of intent to file suit is deemed to have been served on the postmark date).

⁵ Stormwater is water from precipitation events that flows across the ground and pavement after it rains or after snow and ice melt. See 40 C.F.R. § 122.26(b)(13).

⁶ 33 U.S.C. §§ 1311(a) and 1342(p)(2)(B).

Stormwater Associated with Industrial Activity (“General Permit”)⁷ issued by the New York State Department of Environmental Conservation (“DEC”), in violation of Clean Water Act Section 402(p), and 40 C.F.R. §§ 122.26(c)(1) and (e)(1).

I.

BACKGROUND

To protect the waters of the United States, the Clean Water Act (“CWA”) prohibits the discharge of pollutants from a “point source” into the waters of the United States without a National Pollutant Discharge Elimination System (“NPDES”) permit.⁸ NPDES permits are issued by the United States Environmental Protection Agency (“EPA”) or by states that have been authorized by EPA to act as NPDES permitting authorities, provided that the state permitting program ensures compliance with the procedural and substantive requirements of the CWA.⁹ In New York, DEC has been delegated the authority to issue NPDES permits. As an authorized state NPDES permitting agency, DEC has elected to issue a statewide general permit for industrial stormwater discharges in New York. The current version of the General Permit came into effect on March 8, 2023.¹⁰ DEC also has the authority to issue SPDES permits for individual applicants.

With every rainfall event, hundreds of millions of gallons of polluted rainwater pour into the Hudson River, Saw Mill River, and other receiving waters. DEC has assessed 62% of New York State’s 87,526 miles of rivers and streams, designating 9% of those miles as impaired.¹¹ DEC has also designated 20% of its assessed New York State lake and reservoir acres, 62% of its assessed estuary waters, and the state’s Great Lakes shoreline as impaired.¹² For the overwhelming majority of water bodies listed as impaired, stormwater runoff is cited as a primary source of the pollutants causing the impairment.¹³ Contaminated stormwater discharges can and must be controlled in order to improve the quality and health of these waterbodies.

II.

STANDARDS AND LIMITATIONS ALLEGED TO HAVE BEEN VIOLATED AND ACTIVITIES ALLEGED TO BE VIOLATIONS

⁷ *SPDES Multi-Sector General Permit For Stormwater Discharges Associated With Industrial Activity*, Permit No. GP-0-23-001, N.Y. DEP’T ENVTL. CONSERVATION (Mar. 8, 2023) [hereinafter *General Permit*], https://www.dec.ny.gov/docs/water_pdf/gp023001final03082023.pdf. This General Permit replaces earlier general permits for the discharge of stormwater associated with industrial activity and will expire on March 7, 2028.

⁸ CWA §§ 301(a), 402(a), 33 U.S.C. §§ 1311(a), 1342(a).

⁹ CWA § 402(b)(1), 33 U.S.C. § 1342(b)(1); 40 C.F.R. § 123.25(a).

¹⁰ *General Permit*, *supra* note 7.

¹¹ *See NYS Section 305(b) Water Quality Report, Executive Summary*, at 6 (2018), https://www.dec.ny.gov/docs/water_pdf/section305b2018.pdf.

¹² *Id.*

¹³ *See generally id.* (identifying urban stormwater runoff as a top ten source of water quality impairment).

A. Royal Coach Is Discharging Stormwater Associated with Industrial Activity to Waters of the United States without Permits.

The Clean Water Act prohibits the discharge of pollutants to the waters of the United States except in accordance with a valid NPDES permit.¹⁴ Royal Coach's industrial activity at the RC Facilities has caused and continues to cause a "discharge of pollutants" within the meaning of Clean Water Act Section 502(12)¹⁵ and a "stormwater discharge associated with industrial activity" within the meaning of 40 C.F.R. § 122.26(b)(14) from each RC Facility on at least each and every day that there has been a rain event of more than 0.1 inches.¹⁶

On its website, Royal Coach states that it contracts school bus services to schools throughout the tri-state area.¹⁷ Royal Coach's activities at the RC Facilities support these services and include, but are not limited to, vehicle and equipment storage, maintenance, and fueling activities. The RC Facilities have exposed and continue to expose industrial pollutants to stormwater, at a minimum, by: (a) maintaining and fueling buses and other vehicles on site and parking such vehicles outside; (b) storing other machinery and equipment outside or otherwise exposing them to the elements; and (c) from vehicles entering and leaving the Facility that track pollutants off site. During precipitation events (including runoff from rainfall and snow or ice melt events), pollutants are carried away from the RC Facilities and stormwater discharges overland and through drains from the RC Facilities to waters of the United States.

Most of Royal Coach's industrial activities at the RC Facilities are conducted outdoors, or are otherwise conducted in roofed areas and/or buildings that are inadequately protective of spilled materials, vehicle track-out, and other pollutant sources coming into contact with stormwater. In carrying out the above activities at the RC Facilities, Royal Coach engages in storing and handling materials, vehicles, fuel, and equipment in a manner that exposes pollutants to precipitation and snowmelt. Buses and other vehicles driving on and off the property are point sources of pollution. Because Royal Coach fails to adequately shelter and otherwise contain these materials to prevent their release to the environment, precipitation falls on and flows over exposed materials, fluids, and particulates.

The stormwater discharged from the RC Facilities enters waters of the United States and can bring with it solids that suspend or dissolve in stormwater, metals, hydraulic fluids, fuel, and other pollutants,¹⁸ such as anti-freeze, oil, lubricants, PCBs, PAHs, an array of metals, pH-affecting substances and chemical residues. These toxic pollutants are often generated in the form of small particulate matter, which settles on the ground and other surfaces that are exposed to stormwater and non-stormwater flows.

¹⁴ CWA §§ 301(a), 402.

¹⁵ 33 U.S.C. § 1362(12).

¹⁶ EPA has determined that precipitation greater than 0.1 inches in a 24-hour period constitutes a measurable precipitation event for the purposes of evaluating stormwater runoff associated with industrial activity. *See, e.g.*, 40 C.F.R. § 122.26(c)(i)(E)(6) (using 0.1 inches as the distinguishing threshold of a storm event).

¹⁷ ROYAL COACH LINES, <https://www.royalcoachlines.com/> (last visited December 13, 2023).

¹⁸ *See Industrial Stormwater Fact Sheet Series – Sector P*, EPA-833-F-06-031, U.S. ENVTL. PROT. AGENCY (Feb. 2021), https://www.epa.gov/sites/default/files/2015-10/documents/sector_p_transportationfacilities.pdf.

The waters to which RC Facilities discharge—the Saw Mill River, the Pocantico River, the Plum Brook, and the Rum Brook—are all tributaries to the Hudson River and “waters of the United States,” as defined in 40 C.F.R. § 122.2 and, therefore, “navigable waters” as defined in CWA Section 502(7). Royal Coach does not have NPDES permits for these discharges of pollutants. Thus, Royal Coach is discharging polluted industrial stormwater into navigable waters of the United States without the permits required under CWA Sections 301 and 402.

B. Royal Coach is Failing to Apply for NPDES Permit Coverage.

Royal Coach is engaged in the business of storing, maintaining, fueling, and deploying vehicles at the RC Facilities. Royal Coach is therefore an industrial discharger engaged in local trucking and vehicle and equipment maintenance under Standard Industrial Classification (“SIC”) Code 4212, which are industrial activities included in Sector P of the General Permit. Pursuant to CWA Section 402(p) and the regulations promulgated by EPA pursuant to the CWA, Royal Coach must apply for coverage under the General Permit or individual NPDES permits for Royal Coach’s discharges of polluted stormwater. In addition, Royal Coach must apply for an individual NPDES permit for any RC Facility that is discharging process wastewater, or has any other non-stormwater discharge containing pollutants, that is not authorized by the General Permit. By failing to apply for coverage under the General Permit or individual permits, Royal Coach is violating CWA Sections 301(a), 402(a) and 402(p) and 40 C.F.R. §§ 122.26(c)(1) and (e)(1).¹⁹

To be eligible to discharge stormwater associated with its industrial activities under the General Permit, Royal Coach must submit to DEC a registration form called a “Notice of Intent”²⁰ for each RC Facility. To register, Royal Coach is required, among other things, to list all stormwater discharges, to describe each of the industrial activities taking place in the drainage area of each discharge and the acreage of industrial activity exposed to stormwater, the immediate surface waterbody or wetland to which site runoff discharges, and the name of the watershed and nearest waterbody to which the site ultimately discharges and information about whether the receiving waters are impaired. Royal Coach has failed to prepare and file Notices of Intent or applications for individual permits for the RC Facilities.

C. Royal Coach is Failing to Comply with the General Permit.

¹⁹ Sections 301(a) and 402(a) and (p) make it unlawful for Royal Coach to discharge stormwater associated with industrial activity without obtaining a NPDES permit. 40 C.F.R. Sections 122.26(c)(1) and (e)(1) require Royal Coach to apply for a NPDES permit that covers Royal Coach’s discharge of stormwater associated with industrial activity for each RC Facility.

²⁰ *General Permit*, *supra* note 7, Part I.D.1.a.2. In notifying Royal Coach that its current practices violate the General Permit, Riverkeeper does not concede that all of the activities conducted at the RC Facilities are necessarily eligible for coverage under that permit. For example, if a RC Facility is discharging process wastewater, such as wash water, or has any other polluted non-stormwater discharge that is not authorized by the General Permit, then an individual NPDES permit is required, and the failure to obtain and comply with an individual NPDES permit for such discharges also violates CWA §§ 301(a) and 402(p). The conditions for eligibility to discharge under the General Permit are provided at Part I.B of the permit.

As a discharger of stormwater associated with industrial activity, Royal Coach must comply at all times with the requirements of the General Permit (or individual permits that are at least as stringent). By discharging stormwater associated with industrial activity without complying with the General Permit, Royal Coach is violating CWA Sections 301(a) and 402(a) and (p).²¹ The following summarizes the main General Permit requirements that Royal Coach has failed and continues to fail to meet.

1. Royal Coach has not developed and implemented Stormwater Pollution Prevention Plans.

Before submitting a Notice of Intent (registration form), Royal Coach must prepare, make available, and implement a Stormwater Pollution Prevention Plan (“SWPPP”) for each RC Facility in accordance with schedules established in the General Permit.²² The SWPPPs must identify potential sources of pollution that may affect the quality of stormwater discharges associated with industrial activity. Further, the SWPPPs must describe and ensure the implementation of practices that minimize the discharge of pollutants in these discharges and that assure compliance with the other terms and conditions of the General Permit, including achievement of effluent limitations.²³

Among other things, the SWPPPs must include: a general site description; a general location map identifying the location of the facility and all receiving waters to which stormwater discharges; information related to a company stormwater pollution prevention team; a summary of potential pollutant sources; a description of control measures and best management practices; and schedules and procedures for implementation of control measures, monitoring, and inspections.²⁴

Royal Coach has not developed and implemented legally compliant SWPPPs for the RC Facilities, as required by Part III of the General Permit.²⁵ The failure to develop and implement pollution prevention plans and take the other required measures are violations occurring at the RC Facilities in general and in the inadequate documents themselves.²⁶

2. Royal Coach has not implemented control measures and Best Management Practices that meet the best available technology standards.

²¹ Sections 301(a) and 402(a) and (p) make it unlawful for Royal Coach to discharge stormwater associated with industrial activity without first complying with all of the conditions established in a NPDES permit.

²² *General Permit*, *supra* note 7, Part III.C.

²³ *Id.*, Part III.A.

²⁴ *Id.*

²⁵ Riverkeeper believes no SWPPPs exist for the RC Facilities. If a SWPPP exists at an RC Facility, then it is either facially inadequate or has not been fully and adequately implemented.

²⁶ The federal courts have held that a reasonably specific indication of the area where violations occurred, such as the name of the facility, is sufficient and that more precise locations need not be included in the notice. *See, e.g., NRDC v. Sw. Marine, Inc.*, 945 F. Supp. 1330, 1333 (S.D. Cal. 1996), *aff'd* 236 F.3d 985, 996 (9th Cir. 2000); *City of New York v. Anglebrook Ltd. P'ship*, 891 F. Supp. 900, 908 (S.D.N.Y. 1995); *United Anglers v. Kaiser Sand & Gravel Co.*, No. C 95-2066 CW, 1995 U.S. Dist. LEXIS 22449 at *4 (N.D. Cal. Sept. 27, 1995).

Royal Coach cannot legally discharge stormwater under the General Permit from the RC Facilities until Royal Coach implements mandatory general and sector-specific control measures called Best Management Practices (“BMPs”), in accordance with good engineering practices, in order to minimize the discharge of pollutants from the RC Facilities and meet the other effluent limits contained in the General Permit.²⁷ The selected measures must reduce the discharge of pollution from each Facility to the extent practicable through use of the best available technology for the industry.²⁸

The General Permit’s effluent limits include both limits specific to certain sectors²⁹ and limits that apply to all facilities.³⁰ These restrictions include minimizing the exposure of pollutants to stormwater and minimizing the discharge of pollutants in stormwater to the extent achievable using control measures, including BMPs, that are technologically available and economically practicable and achievable in light of best industry practice.³¹

Royal Coach has not minimized the exposure of pollutants or the discharge of pollution to the extent achievable by implementing control measures or BMPs that are technologically achievable and economically practicable and achievable in light of best industry practice, as required by Parts II and VII of the General Permit and the Clean Water Act.

3. Royal Coach has not conducted routine site inspections and complied with monitoring, recordkeeping, and reporting requirements.

Royal Coach must conduct an annual comprehensive site inspection and evaluation of areas where industrial materials or activities are exposed to stormwater at each RC Facility.³² The inspection must ensure that all stormwater discharges are adequately controlled and that all BMPs are functioning as expected.³³ Records of this inspection must be kept for five years.³⁴

In addition, qualified facility personnel must carry out routine inspections at least quarterly.³⁵ During these inspections, personnel must evaluate conditions and maintenance needs of stormwater management devices, detect leaks and ensure the good condition of containers, evaluate the performance of the existing stormwater BMPs described in the SWPPPs, and document any deficiencies in the implementation and/or adequacy of the SWPPPs.³⁶ Such

²⁷ *General Permit*, *supra* note 7, Part II; *see also id.* Part VII (setting forth sector-specific control measures and practices); Part III.A.7 (“The SWPPP must document the location and type of BMPs installed and implemented at the facility to achieve the non-numeric effluent limitations in Part II.A and where applicable in Part VII, and the sector specific numeric effluent limitations in Part VII.”).

²⁸ See 33 U.S.C. § 1311(b)(2).

²⁹ *See generally id.*, Part VII (laying out sector-specific requirements).

³⁰ *Id.*, Part II.

³¹ *Id.* (“Effluent limitations are required to minimize the discharge of pollutants.”); *id.*, Appendix A (defining the term “minimize.”).

³² *Id.*, Part IV.A.1.

³³ *Id.*

³⁴ *Id.*, Part IV.A.2.

³⁵ *Id.*, Part IV.B.

³⁶ *Id.*, Part IV.B.

deficiencies must then be addressed through corrective actions.³⁷

The General Permit requires that all covered facilities conduct multiple types of analytical monitoring, and DEC may require additional individualized monitoring as well.³⁸ In particular, all facilities authorized under the General Permit must, at minimum:

- conduct visual monitoring of stormwater discharges at least quarterly;³⁹
- collect and analyze stormwater samples for each outfall at least semi-annually;⁴⁰
- perform an annual dry weather inspection to detect non-stormwater discharges;⁴¹
- inspect, sample, and monitor discharges from secondary containment structures and transfer areas;⁴²
- document storm events during which any samples are taken;⁴³
- document all of these monitoring activities;⁴⁴
- keep records of the monitoring with the Facility's SWPPP;⁴⁵ and
- submit an annual report to DEC accompanied by a Discharge Monitoring Report detailing the results of all required stormwater samples, as well as reports that document any instance of non-compliance with benchmarks or numeric effluent limitations.⁴⁶

In addition, because Royal Coach engages in industrial activities associated with Sector P, sampling is required for:

- Oil & Grease;
- Chemical Oxygen Demand;
- Benzene;
- Ethylbenzene;
- Toluene; and
- Xylene.⁴⁷

Riverkeeper is not necessarily aware of all industrial activities taking place at the RC Facilities. To the extent that industrial activities other than the above are carried out at the RC Facilities, other sampling may be required as well.⁴⁸ This notice provides Royal Coach with sufficient information to identify the standards and limitations that apply to all categories of industrial activity.

³⁷ *General Permit*, *supra* note 7, Part V.

³⁸ *Id.*, Part IV.F.1, 2.

³⁹ *Id.*, Part IV.E.

⁴⁰ *Id.*, Part IV.F.2.

⁴¹ *Id.*, Part IV.C.

⁴² *Id.*, Part IV.F.1.e.

⁴³ *Id.*, Part IV.D.3.

⁴⁴ *Id.*, Parts IV, VI.

⁴⁵ *Id.*, Part IV.A.2.

⁴⁶ *Id.*, Part VI.A.

⁴⁷ *Id.*, Part VII.P.

⁴⁸ *See generally id.*, Part VII (outlining sector-specific requirements).

Royal Coach has not conducted the required annual and other routine inspections, monitoring, and testing at the RC Facilities, as required by, at least, Parts IV, VI, and VII of the General Permit. Royal Coach also has not retained records and submitted monitoring reports to DEC pertaining to the RC Facilities, as required by, at least, Parts IV, VI, and VII of the General Permit.

4. Royal Coach has failed to comply with additional requirements located in Part VII of the General Permit.

As noted above, the General Permit contains various requirements specific to Sector P. These requirements are collected in Part VII of the General Permit. Royal Coach has failed to comply with these additional requirements of Part VII of the General Permit.

5. Royal Coach does not comply with the additional requirements in the General Permit for discharges to impaired waters.

Discharges to an impaired waterbody are not eligible for coverage under the General Permit if the cause of impairment is a pollutant of concern included in the benchmarks and/or numeric effluent limitations to which the facility is subject unless the facility:

- Prevents all exposure to stormwater of the pollutant(s) for which the waterbody is impaired; or
- Documents that the pollutant for which the waterbody is impaired is not present on-site; or
- Provides additional information in the SWPPP to minimize the pollutant of concern causing the impairment as specified in Part III.D.2.⁴⁹

If discharges of such a pollutant of concern are authorized as provided above, the permittee must conduct quarterly sampling of its discharges for that pollutant.⁵⁰

Royal Coach discharges oxygen-demanding pollutants from several RC Facilities into waterbodies impaired for low levels of dissolved oxygen (i.e. substances that can be oxidized).⁵¹ Under the General Permit, chemical oxygen demand (“COD”) is a pollutant of concern—i.e., a cause of impairment—in waters impaired for low dissolved oxygen.⁵² A waterbody impaired for a lack of oxygen by definition lacks the capacity to absorb stormwater discharges with high oxygen demand (chemical or biological). If stormwater with COD at levels exceeding the General Permit’s benchmarks is discharged into a waterbody impaired by lack of oxygen, the discharge contributes to the ongoing violation of the oxygen water quality standard applicable to that waterbody. As such, a discharge of stormwater with high COD into a waterbody impaired

⁴⁹ *General Permit*, *supra* note 7, Part II.C.2.

⁵⁰ *Id.*, Part IV.F.2.

⁵¹ *See infra*, Part IV.

⁵² *See Id.*, Appx F.

for low dissolved oxygen—including any discharge that exceeds the General Permit’s COD benchmark—is a violation of the General Permit.

Royal Coach has failed to prevent all exposure of COD, submit documents that COD is not present on-site, or submit SWPPPs with the additional information specified in Part III.D.2 of the General Permit. In addition, because Royal Coach discharges oxygen-demanding pollutants into waterbodies impaired for low levels of dissolved oxygen, Royal Coach must sample for COD quarterly at the RC Facilities discharging to those impaired waterbodies. Royal Coach has failed to comply with these requirements.

In sum, Royal Coach’s discharge of stormwater associated with industrial activities without a permit, Royal Coach’s failure to apply for permit coverage, and Royal Coach’s failure to comply with the above-listed conditions of the General Permit (or an individual NPDES permit) constitute violations of the General Permit and of Sections 301(a) and 402(p) of the Clean Water Act.

III.

PERSONS RESPONSIBLE FOR ALLEGED VIOLATIONS

Royal Coach Lines, LLC; Royal Coach Lines, Inc.; and Steven DiPaolo (“Royal Coach”) are the persons responsible for the violations alleged in this Notice. Royal Coach has operational control over the day-to-day industrial activities at the RC Facilities. Royal Coach is responsible for managing stormwater at the RC Facilities in compliance with the CWA. Riverkeeper hereby puts Royal Coach on notice that if Riverkeeper subsequently identifies additional persons as also being responsible for the violations set forth above, Riverkeeper intends to include those persons in this action.

IV.

LOCATION OF THE ALLEGED VIOLATIONS

The violations alleged in this Notice have occurred and continue to occur at the Facilities located at:

A. 1010 Nepperhan Ave. Yonkers, NY 10703 (“RC Corporate Facility”)

Royal Coach conducts maintenance at the RC Corporate Facility. There is at least one maintenance bay and at least one above-ground, exposed fueling tank and station on the property. There are no BMPs evident at the RC Corporate Facility.

Stormwater associated with industrial activity from the RC Corporate Facility discharges to the Lower Saw Mill River. The Facility is east of Nepperhan Avenue and the property grades downwards from Nepperhan Avenue towards the Saw Mill River. Based on its investigation, Riverkeeper concludes that due to the grading, paving, and construction of

structures on the site, stormwater is collected and conveyed along gradients across the RC Corporate Facility, towards the eastern perimeter of the RC Corporate Facility, and likely discharges directly to the Saw Mill River. Riverkeeper also believes that stormwater entering storm drains in the parking area likely discharges through subsurface conduits to the Saw Mill River.

DEC has classified the Lower Saw Mill River, where this Facility discharges, as a Class C water.⁵³ Under New York's Water Quality Standards, a waterbody that is designated as Class C is meant to be suitable for fishing and for fish, shellfish, and wildlife propagation and survival, as well as for potential use for primary and secondary contact recreation.⁵⁴ The New York Water Quality Standards also set numeric and narrative criteria for different water pollution parameters including dissolved oxygen, oil and grease, suspended and settleable solids, bacteria (pathogens), pH, temperature, nutrients, and others.⁵⁵ A waterbody must meet these numeric and narrative criteria in order to support its designated uses.

The Lower Saw Mill River consistently fails to meet state water quality standards; illegal stormwater discharges from the RC Corporate Facility contribute to this failure.⁵⁶ DEC has designated the Lower Saw Mill River as impaired pursuant to CWA Section 303(d)⁵⁷ for failure to meet minimum water quality standards for a number of pollutants, including but not limited to chlordane, phosphorous, low dissolved oxygen, and fecal coliform.⁵⁸

B. 870 Nepperhan Ave. Yonkers, NY, 10703 ("870 Nepperhan Facility")

Royal Coach conducts maintenance at the 870 Nepperhan Facility. There are at least three maintenance bays on the border of the property facing the parking area. Fluids and other pollutants on the pavement outside of the maintenance bays are exposed to stormwater, as are waste materials kept along the southern fence line. Paving at the 870 Nepperhan Facility shows signs of pollution such as staining. There are no BMPs evident at the 870 Nepperhan Facility.

Stormwater associated with industrial activity from the 870 Nepperhan Facility discharges to the Lower Saw Mill River. The Saw Mill River abuts the 870 Nepperhan Facility to the east, and the property grades downwards towards the Saw Mill River. The parking area has an upper and lower level, and the grade is significantly lower on the lower level and grades even further down to a low point at the base of River Place. Based on its investigation, Riverkeeper concludes that stormwater from the 870 Nepperhan Facility flows to the lower parking area and from the lower parking area to points on the eastern property border, then discharges directly to the Saw Mill River. Riverkeeper also concludes that

⁵³ 6 N.Y.C.R.R. § 859.4.

⁵⁴ 6 N.Y.C.R.R. § 701.8.

⁵⁵ See generally §§ 702, 703 (outlining quantitative and qualitative standards, respectively).

⁵⁶ Section 303(d) List of Impaired Waters Requiring a TMDL/Other Strategy, N.Y. DEP'T ENVTL. CONSERVATION, 20 (June 2020), https://www.dec.ny.gov/docs/water_pdf/section303d2018.pdf [hereinafter "*303(d) List*"].

⁵⁷ 33 U.S.C. § 1313(d).

⁵⁸ *303(d) List*, *supra* note 56, at 6, 16.

stormwater flows from the lower parking area through the driveway to the terminus of River Place, and into the Saw Mill River. Stormwater also flows to a municipal storm sewer that runs east from Nepperhan Avenue to the Saw Mill River below River Place and discharges directly to the Saw Mill River.

As discussed above, DEC has classified the Lower Saw Mill River as a Class C water, and it is impaired for failure to meet minimum water quality standards for a number of pollutants including low dissolved oxygen.⁵⁹

C. 51 NY-100, Briarcliff Manor, NY 10510 (“Ossining Facility”)

Royal Coach conducts maintenance at the Ossining Facility. There is at least one maintenance bay and at least one above-ground, exposed fuel tank and station on the property. Buses park at the eastern edge of the parking lot just feet from the western bank of the Pocantico River. There are no BMPs evident at the Ossining Facility.

Stormwater associated with industrial activity from the Ossining Facility discharges to the Middle Pocantico River. The Pocantico River borders the Ossining Facility to the east, and the property grades down towards the Pocantico River. Based on its investigation, Riverkeeper concludes that stormwater flows overland from the southeast corner of the parking area adjacent to the Pocantico River, and from other points at the eastern edge of the Ossining Facility, into the Pocantico River.

DEC has classified the Middle Pocantico River, where the Ossining Facility discharges, as a Class B(T) water.⁶⁰ Under New York Water Quality Standards, a waterbody that is designated as Class B is meant to be suitable for fishing and for fish, shellfish, wildlife propagation and survival, and for primary and secondary contact recreation.⁶¹ The New York Water Quality Standards also set numeric and narrative criteria for different water pollution parameters including dissolved oxygen, oil and grease, suspended and settleable solids, bacteria (pathogens), pH, temperature, nutrients, and others.⁶² A waterbody must meet these numeric and narrative criteria in order to support its designated uses.

In addition to those general Class B requirements, DEC has specific requirements for Class (T) waters. Under New York’s Water Quality Standards, a waterbody that is designated as Class (T) is meant to be suitable for trout habitat.⁶³ Under New York regulations for the Lower Hudson River Drainage Basin, the term “trout” includes the genera *Coregonus*, *Oncorhynchus*, *Prosopium*, *Salmo*, *Salvelinus*, and *Thymallus*.⁶⁴ In this region, trout and

⁵⁹ *Supra*, Part IV.A & nn.53–58.

⁶⁰ 6 N.Y.C.R.R. § 864.6

⁶¹ 6 N.Y.C.R.R. § 701.7.

⁶² *See generally* §§ 702, 703 (outlining quantitative and qualitative standards, respectively).

⁶³ 6 N.Y.C.R.R. § 701.25(a).

⁶⁴ 6 N.Y.C.R.R. § 864.3(i).

trout-spawning waters require a higher dissolved oxygen content.⁶⁵ Further, trout are particularly sensitive to low levels of metals. The discharge of metals and pollutants that affect oxygen levels in the water are thus of particular concern at the Ossining Facility.

D. 2260 Saw Mill River Rd. Elmsford, NY 10523 (“Elmsford Facility”)

Royal Coach conducts maintenance, including vehicle washing, at the Elmsford Facility. There is at least one above-ground, exposed fueling tank and station at the Elmsford Facility. Buses park just feet from the edge of the Rum Brook. There are no BMPs evident at the Elmsford Facility.

Stormwater associated with industrial activity from the Elmsford Facility discharges to the Rum Brook, which is a tributary to the Upper Saw Mill River. The Rum Brook abuts the Elmsford Facility on the east and flows north around the property and then westerly to the Saw Mill River. Based on its investigation, Riverkeeper concludes that stormwater from the Elmsford Facility flows to storm drains on the property that discharge through subsurface conduits northeast towards the Rum Brook. Stormwater also discharges directly to the Rum Brook via a ceramic pipe located near the Elmsford Facility’s northern back parking lot, flowing from the direction of the Elmsford Facility, and from a drainage swale just east of the ceramic pipe, also coming from the direction of the Elmsford Facility’s back parking lot. Stormwater may also discharge to the Rum Brook through interior drains on the property.

DEC has classified the Rum Brook, where the Elmsford Facility discharges, as a Class C water.⁶⁶ Under New York’s Water Quality Standards, a waterbody that is designated as Class C is meant to be suitable for fishing and for fish, shellfish, and wildlife propagation and survival, as well as for primary and secondary contact recreation.⁶⁷ The New York Water Quality Standards also set numeric and narrative criteria for different water pollution parameters including dissolved oxygen, oil and grease, suspended and settleable solids, bacteria (pathogens), pH, temperature, nutrients, and others.⁶⁸ A waterbody must meet these numeric and narrative criteria in order to support its designated uses.

DEC assesses water quality in the Rum Brook in conjunction with water quality in the Upper Saw Mill River. The Upper Saw Mill River consistently fails to meet water quality standards; illegal stormwater discharges from the Elmsford Facility contribute to this failure.⁶⁹ DEC has designated the Upper Saw Mill River as impaired pursuant to CWA Section 303(d)⁷⁰ for failure to meet the minimum water quality standards for pollutants including but not

⁶⁵ 6 N.Y.C.R.R. § 863.3(h); *see also* § 703.3 (“For trout spawning waters (TS), the DO concentration shall be not less than 7.0 mg/L from other than natural conditions. For trout waters (T), the minimum daily average shall not be less than 6.0 mg/L, and at no time shall the concentration be less than 5.0 mg/L. For nontrout waters, the minimum daily average shall not be less than 5.0 mg/L, and at no time shall the DO concentration be less than 4.0 mg/L.”).

⁶⁶ 6 N.Y.C.R.R. § 859.4.

⁶⁷ 6 N.Y.C.R.R. § 701.8.

⁶⁸ *See generally* §§ 702, 703 (outlining quantitative and qualitative standards, respectively).

⁶⁹ 303(d) List, *supra* note 56.

⁷⁰ 33 U.S.C. § 1313(d).

limited to chlordane.⁷¹

E. 120 Primrose St. Lincolndale, NY 10594 (“Somers Facility”)

Royal Coach conducts maintenance and fueling at the Somers Facility. There is at least one maintenance bay and at least one above-ground, exposed storage tank and fueling station on the property. There are no BMPs for preventing exposure of pollutants to stormwater evident at the Somers Facility, although there appear to be stormwater retention ponds eastwards.

Stormwater associated with industrial activity from the Somers Facility discharges to the Lower Plum Brook. The Somers Facility is located east of Somers High School at the terminus of an access road from the school. The property slopes downward east towards the Somers Facility. The Plum Brook is east of the Somers Facility, further downgrade. Based on its investigation, Riverkeeper concludes that stormwater from the Somers Facility, including stormwater that flows to the Somers Facility from catch basins along the access road, flows downgrade from the Somers Facility, possibly through the retention ponds, and then discharges to the Plum Brook or a tributary of Plum Brook.

DEC has classified the Lower Plum Brook, where this Facility discharges, as a Class B(TS) water.⁷² Under New York Water Quality Standards, a waterbody that is designated as Class B is meant to be suitable for fishing and for fish, shellfish, and wildlife propagation and survival, as well as for primary and secondary contact recreation.⁷³ The New York Water Quality Standards also set numeric and narrative criteria for different water pollution parameters including dissolved oxygen, oil and grease, suspended and settleable solids, bacteria (pathogens), pH, temperature, nutrients, and others.⁷⁴ A waterbody must meet these numeric and narrative criteria in order to support its designated uses.

In addition to those general Class B requirements, DEC has specific requirements for Class (TS) waters. Under New York’s Water Quality Standards, a waterbody that is designated as Class (TS) is meant to be suitable for trout habitat and trout spawning.⁷⁵ Under New York regulations for the Lower Hudson River Drainage Basin, the term “trout” includes the genera *Coregonus*, *Oncorhynchus*, *Prosopium*, *Salmo*, *Salvelinus*, and *Thymallus*.⁷⁶ In this region, trout and trout spawning waters require a higher dissolved oxygen content.⁷⁷ Further, trout are particularly sensitive to low levels of metals. The discharge of metals and

⁷¹ 303(d) List, *supra* note 56, at 16.

⁷² 6 N.Y.C.R.R. § 864.6

⁷³ 6 N.Y.C.R.R. § 701.7.

⁷⁴ See generally §§ 702, 703 (outlining quantitative and qualitative standards, respectively).

⁷⁵ 6 N.Y.C.R.R. § 701.25(b).

⁷⁶ 6 N.Y.C.R.R. § 864.3(i).

⁷⁷ 6 N.Y.C.R.R. § 863.3(h); see also § 703.3 (“For trout spawning waters (TS), the DO concentration shall be not less than 7.0 mg/L from other than natural conditions. For trout waters (T), the minimum daily average shall not be less than 6.0 mg/L, and at no time shall the concentration be less than 5.0 mg/L. For nontrout waters, the minimum daily average shall not be less than 5.0 mg/L, and at no time shall the DO concentration be less than 4.0 mg/L.”).

pollutants that affect oxygen levels in the water are of particular concern at the Somers Facility.

F. Additional RC Facilities

Additionally, Riverkeeper believes that discharges of stormwater associated with industrial activity from the following RC Facilities may also violate the CWA:

- 924 Broadway Thornwood, NY 10594 ("Thornwood Facility");
- 1228 Saw Mill River Rd., Yonkers, NY 10710 ("1228 SMRR Facility"); and
- 475 W Hartsdale Ave., Hartsdale NY, 10530 ("Greenburgh Facility").

Riverkeeper's investigation into these three facilities is ongoing. If these facilities are also discharging industrial stormwater without a permit to federally protected waters, Riverkeeper will include these three facilities in the lawsuit it intends to file.

V.

DATES OF VIOLATION

Every day that Royal Coach discharges industrial stormwater without permit coverage from each and any of the RC Facilities is a separate violation of CWA Section 301(a) and EPA's regulations implementing the CWA. Riverkeeper believes that Royal Coach has discharged pollution without permits in violation of Section 301(a) of the CWA on every day since Royal Coach commenced operations at the RC Facilities on which there has been a measurable precipitation event or discharge of previously accumulated precipitation (i.e., snowmelt) over 0.1 inches.

Appendix A sets forth specific rain dates on which Riverkeeper alleges that the RC Facilities discharged stormwater from unpermitted outfalls in violation of Section 301(a) of the Clean Water and of the General Permit. The second column shows precipitation. Riverkeeper alleges that each RC Facility discharged stormwater on each day of these events, as either 0.1 inch of rain or 1.0 inch of snow (shown here in water-equivalent inches) fell on these days. This list of dates is not exclusive, and Riverkeeper hereby notifies Royal Coach that Riverkeeper intends to take legal action regarding any other days on which Riverkeeper later learns that Royal Coach discharged pollutants from any of the RC Facilities to waters of the United States. In sum, Riverkeeper alleges that the RC Facilities discharged stormwater from its unpermitted outfalls at each of the RC Facilities on 415 days since December 15, 2018.

Further, every day upon which Royal Coach has failed to apply for permit coverage since Royal Coach first commenced operations at each of the RC Facilities is a separate violation of CWA Section 301(a) and EPA's regulations implementing the CWA.⁷⁸

⁷⁸See also 33 U.S.C. §§ 402(p)(3)(A) and (p)(4)(A) (requiring the establishment of industrial stormwater NPDES permits and of a permit application process).

Finally, if Royal Coach seeks permit coverage after receiving this letter but fails to fully comply with the requirements of the General Permit (or individual permits), each day upon which Royal Coach claims coverage under a NPDES permit but fails to comply with that permit will constitute a separate day of violation with respect to each unmet condition of that permit.

Royal Coach is liable for the above-described violations occurring prior to the date of this letter, and for every day after the date of this letter that these violations continue. In addition to the violations set forth above, this Notice covers all violations of the CWA evidenced by information that becomes available to Riverkeeper after the date of this Notice of Intent to File Suit.⁷⁹ These violations are ongoing and, barring full compliance with the permitting requirements of the Clean Water Act, these violations will continue.

VI.

RELIEF REQUESTED

Riverkeeper will ask the court to order Royal Coach to comply with the CWA, to pay penalties, and to pay Riverkeeper's costs and legal fees.

First, Riverkeeper will seek declaratory relief and injunctive relief to prevent further violations of the Clean Water Act pursuant to Sections 505(a) and (d) and such other relief as permitted by law. Riverkeeper will seek an order from the Court requiring Royal Coach to obtain NPDES permit coverage and to correct all other identified violations through direct implementation of control measures and demonstration of full regulatory compliance.

Second, pursuant to CWA Section 309(d),⁸⁰ each separate violation of the CWA subjects Royal Coach to a penalty for each violation per day. Riverkeeper will seek the full penalties allowed by law; the current statutory maximum per violation per day is \$64,618.⁸¹

Third, pursuant to CWA Section 505(d), Riverkeeper will seek recovery of its litigation fees and costs (including reasonable attorney and expert witness fees) associated with this matter.⁸²

VII.

PERSONS GIVING NOTICE

⁷⁹ See, e.g. *Pub. Interest Research Grp. v. Hercules, Inc.*, 50 F.3d 1239, 1248-49 (3d Cir. 1995) (a notice that adequately identifies specific violations to a potential defendant also covers repeated and related violations that the plaintiff learns of later. "For example, if a permit holder has discharged pollutant 'x' in excess of the permitted effluent limit five times in a month but the citizen has learned only of four violations, the citizen will give notice of the four violations of which the citizen then has knowledge but should be able to include the fifth violation in the suit when it is discovered.")

⁸⁰ 33 U.S.C. § 1319(d); see also 40 C.F.R. § 19.4 (Adjustment of Civil Monetary Penalties for Inflation).

⁸¹ 40 C.F.R. §§ 19.2 and 19.4.

⁸² 33 U.S.C. § 1365(d).

The full name, address, and telephone number of the persons giving notice are as follows:

Riverkeeper, Inc.
20 Secor Road
Ossining, NY 10562
(914) 478-4501
Attn: Victoria Leung

VIII.

IDENTIFICATION OF COUNSEL

Riverkeeper is represented by legal counsel in this matter. The name, address, and telephone number of Riverkeeper's attorneys are:

Julia Muench, Esq.
Andie Altchiler, Esq.
Super Law Group, LLC
222 Broadway, 22nd Floor
New York, New York 10038
(212) 242-2355

IX.

CONCLUSION

The foregoing provides more than sufficient information to permit Royal Coach to identify the specific standard, limitation, or order alleged to have been violated, the activity alleged to constitute a violation, the person or persons responsible for the alleged violation, the location of the alleged violation, the date or dates of such violation, and the full name, address, and telephone number of the person giving notice.⁸³

If Royal Coach has developed SWPPPs, Riverkeeper requests that Royal Coach send a copy to the undersigned attorney.⁸⁴ Otherwise, Riverkeeper encourages Royal Coach to begin developing SWPPPs immediately after receiving this letter and asks that Royal Coach please inform the undersigned attorney of Royal Coach's efforts so Riverkeeper can work with Royal Coach to avoid disputes over the contents of the SWPPPs.⁸⁵

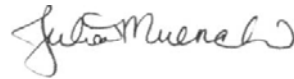
⁸³ 40 C.F.R. § 135.3(a).

⁸⁴ Note that under Part III.C.2 of the General Permit, the owner or operator of a facility "must make a copy of the SWPPP available to the public within fourteen (14) days of receipt of a written request." If Royal Coach develops a SWPPP or already has a SWPPP for any RC Facility and fails to send a copy of the SWPPP to the undersigned attorney, Riverkeeper will include that violation in the lawsuit it intends to file.

⁸⁵ Riverkeeper will not send a new notice letter in response to any effort Royal Coach makes to come into compliance with the Clean Water Act after receiving this letter, for example, by developing a SWPPP. The federal courts have held that citizens sending a notice letter are not required to identify inadequacies in compliance documents that do not yet exist and are "not required to send a second notice letter in order to pursue specific

During the sixty-day notice period, Riverkeeper is willing to discuss effective remedies for the violations noted in this letter that may avoid the necessity of protracted litigation. If Royal Coach wishes to pursue such discussions, please contact the undersigned attorney immediately so that negotiations may be completed before the end of the sixty-day notice period. We do not intend to delay the filing of a complaint in federal court, regardless of whether discussions are continuing at the conclusion of the sixty days.

Very truly yours,



Julia Muench
Andie Altchiler
Super Law Group, LLC
222 Broadway, 22nd Floor
New York, New York 10038
(212) 242-2355
Julia@superlawgroup.com

cc:

Michael Regan, Administrator
Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Lisa Garcia, EPA Region 2 Administrator
Environmental Protection Agency
290 Broadway
New York, NY 10007-1866

Basil Seggos, Commissioner
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233-1011

claims regarding the inadequacies of Royal Coach's post-notice compliance efforts." *WaterKeepers N. Cal. v. AG Indus. Mfg.*, 375 F.3d 913, 920 (9th Cir. 2004). *See also Sw. Marine, Inc.*, 236 F.3d at 997 (9th Cir. 2000) ("subject matter jurisdiction is established by providing a notice that is adequate on the date it is given to the defendant. The defendant's later changes . . . do not retroactively divest a district court of jurisdiction under 33 U.S.C. § 1365(b)."); *Anglebrook Ltd. P'ship*, 891 F. Supp. at 908 (S.D.N.Y. 1995) (plaintiff's notice letter based on inadequacies of defendant's original SWPPP held sufficient to establish court's jurisdiction, even though defendant later prepared a revised SWPPP).

Appendix A:

NOAA Precipitation Data, December 15, 2018 through December 15, 2023⁸⁶

Date	Precipitation (inches)
12/15/18	0.12
12/16/18	1.04
12/20/18	0.14
12/21/18	2.53
12/28/18	0.83
12/31/18	0.96
1/1/19	0.12
1/5/19	0.77
1/8/19	0.17
1/19/19	0.21
1/20/19	1.02
1/24/19	1.68
1/29/19	0.37
2/6/19	0.36
2/8/19	0.21
2/12/19	0.6
2/20/19	0.52
2/24/19	0.56
3/2/19	0.24
3/3/19	0.5
3/4/19	0.2
3/10/19	0.48
3/15/19	0.36
3/21/19	0.35

Date	Precipitation (inches)
3/22/19	0.49
3/31/19	0.13
4/5/19	0.17
4/8/19	0.18
4/12/19	0.56
4/13/19	0.26
4/15/19	0.72
4/19/19	0.12
4/20/19	0.76
4/22/19	0.23
4/26/19	1.17
4/27/19	0.18
4/30/19	0.17
5/2/19	0.17
5/4/19	0.43
5/5/19	1.11
5/12/19	1.32
5/13/19	0.56
5/14/19	0.16
5/19/19	0.19
5/20/19	0.25
5/23/19	0.28
5/28/19	0.13
5/29/19	0.82

⁸⁶ The rain dates in the table are all the days when 0.1 inch or more rain was observed at the nearest weather station to the Facility. Rain data was accessed from the National Oceanic and Atmospheric Administration. *Climate Data Online Search*, NAT'L OCEANIC & ATMOSPHERIC ADMIN., <https://www.ncdc.noaa.gov/cdo-web/search> (last visited December 18, 2023).

Date	Precipitation (inches)
5/30/19	1.26
6/2/19	0.12
6/10/19	0.42
6/11/19	0.21
6/13/19	0.59
6/16/19	0.14
6/18/19	0.69
6/21/19	0.13
6/25/19	0.28
6/30/19	0.12
7/6/19	0.95
7/8/19	0.1
7/11/19	1.25
7/17/19	0.85
7/18/19	1.65
7/22/19	1.05
7/23/19	0.95
7/31/19	0.73
8/3/19	0.69
8/4/19	0.3
8/7/19	0.35
8/14/19	0.26
8/22/19	0.45
8/23/19	0.21
8/28/19	0.18
9/2/19	0.13
9/7/19	0.12
9/23/19	0.14
9/26/19	0.18

Date	Precipitation (inches)
10/2/19	0.18
10/3/19	0.48
10/7/19	0.42
10/9/19	0.36
10/16/19	2.56
10/20/19	0.4
10/22/19	0.5
10/23/19	0.15
10/27/19	2.2
10/30/19	0.13
10/31/19	0.76
11/1/19	0.12
11/7/19	0.12
11/18/19	0.41
11/19/19	0.38
11/24/19	0.73
12/1/19	0.58
12/2/19	0.16
12/9/19	1.25
12/10/19	0.14
12/11/19	0.25
12/13/19	0.87
12/14/19	1.06
12/17/19	0.5
12/29/19	0.3
12/30/19	0.53
1/3/20	0.11
1/4/20	0.14
1/16/20	0.11

Date	Precipitation (inches)
1/18/20	0.34
1/25/20	1.2
2/6/20	0.31
2/7/20	0.34
2/10/20	0.27
2/11/20	0.29
2/13/20	0.49
2/27/20	0.53
3/3/20	0.28
3/6/20	0.1
3/13/20	0.34
3/17/20	0.11
3/19/20	0.7
3/23/20	0.79
3/28/20	0.27
3/29/20	0.36
4/8/20	0.12
4/9/20	0.26
4/13/20	2.58
4/18/20	0.33
4/21/20	0.23
4/24/20	0.44
4/26/20	0.21
4/30/20	0.84
5/1/20	0.2
5/3/20	0.13
5/8/20	0.53
5/15/20	0.25
5/23/20	0.54

Date	Precipitation (inches)
6/3/20	0.55
6/5/20	0.51
6/11/20	0.12
6/28/20	0.55
7/1/20	0.39
7/3/20	0.75
7/8/20	0.38
7/10/20	1.22
7/17/20	1.15
7/22/20	0.6
7/31/20	1.05
8/3/20	0.38
8/4/20	0.72
8/7/20	0.11
8/16/20	0.26
8/17/20	0.86
8/18/20	0.14
8/19/20	0.12
8/27/20	0.35
8/28/20	0.18
8/29/20	0.1
9/1/20	0.37
9/2/20	0.17
9/3/20	0.79
9/10/20	0.46
9/28/20	0.1
9/29/20	0.58
9/30/20	0.97
10/2/20	0.1

Date	Precipitation (inches)
10/12/20	0.52
10/16/20	1.26
10/28/20	0.27
10/29/20	1.36
10/30/20	0.49
11/1/20	0.47
11/11/20	1.07
11/12/20	0.15
11/13/20	0.1
11/15/20	0.25
11/23/20	0.43
11/26/20	0.66
11/30/20	1.31
12/5/20	0.89
12/14/20	0.11
12/16/20	0.25
12/31/20	0.33
1/1/21	0.34
1/15/21	0.36
1/16/21	0.63
1/26/21	0.12
2/1/21	0.26
2/7/21	0.15
2/16/21	0.68
2/18/21	0.3
2/22/21	0.4
2/27/21	0.35
2/28/21	0.15
3/1/21	0.14

Date	Precipitation (inches)
3/18/21	0.66
3/24/21	0.53
3/28/21	0.82
3/31/21	0.38
4/11/21	0.49
4/12/21	0.24
4/15/21	1.05
4/21/21	0.39
4/25/21	0.51
4/28/21	0.11
5/3/21	0.53
5/4/21	0.54
5/5/21	0.29
5/9/21	0.64
5/26/21	0.27
5/28/21	1.21
5/29/21	0.42
5/30/21	0.84
6/3/21	0.46
6/4/21	0.1
6/7/21	0.4
6/8/21	1.55
6/14/21	0.24
6/19/21	0.87
6/22/21	0.29
7/1/21	0.71
7/2/21	1.17
7/3/21	0.1
7/6/21	0.77

Date	Precipitation (inches)
7/8/21	1.42
7/9/21	0.25
8/8/21	0.16
8/11/21	0.54
8/19/21	0.31
8/22/21	2.38
8/23/21	0.97
9/1/21	6.06
9/2/21	0.1
9/5/21	0.14
9/9/21	0.56
9/16/21	0.11
9/17/21	0.13
9/23/21	0.52
9/24/21	0.59
9/28/21	0.1
10/4/21	0.54
10/10/21	0.13
10/16/21	0.23
10/25/21	0.44
10/26/21	3.91
10/29/21	0.54
10/30/21	0.11
11/12/21	0.51
11/13/21	0.37
11/26/21	0.11
12/6/21	0.3
12/11/21	0.18
12/22/21	0.13

Date	Precipitation (inches)
12/25/21	0.2
1/1/22	0.47
1/5/22	0.19
1/7/22	0.18
1/16/22	0.16
1/17/22	1.24
1/20/22	0.22
2/3/22	0.53
2/4/22	0.52
2/17/22	0.23
2/18/22	0.29
2/22/22	0.26
2/25/22	0.52
3/6/22	0.13
3/9/22	0.39
3/12/22	0.21
3/17/22	0.17
3/19/22	0.14
3/23/22	0.12
3/24/22	0.59
3/31/22	0.16
4/1/22	0.35
4/3/22	0.1
4/6/22	0.28
4/7/22	3.04
4/8/22	0.16
4/9/22	0.13
4/14/22	0.13
4/16/22	0.21

Date	Precipitation (inches)
4/18/22	0.61
4/19/22	0.78
5/2/22	0.15
5/6/22	0.57
5/7/22	0.52
5/14/22	0.17
5/16/22	0.12
5/19/22	0.51
5/20/22	0.18
5/22/22	0.23
5/27/22	0.12
5/28/22	0.69
6/1/22	0.4
6/2/22	0.23
6/8/22	0.15
6/9/22	0.84
6/12/22	0.21
6/13/22	0.91
6/16/22	0.35
6/22/22	0.14
6/23/22	0.12
6/27/22	0.15
7/18/22	3.44
8/1/22	0.29
8/7/22	0.12
8/22/22	0.36
8/30/22	0.23
9/5/22	0.34
9/6/22	0.85

Date	Precipitation (inches)
9/11/22	0.12
9/12/22	0.2
9/13/22	2.2
9/22/22	0.48
9/25/22	0.2
10/1/22	0.24
10/4/22	0.45
10/5/22	0.63
10/13/22	0.85
10/21/23	0.4
10/29/23	0.61
10/30/23	0.33
11/7/23	0.23
11/21/23	0.42
11/22/23	1.42
11/26/23	0.52
12/1/23	0.26
12/3/23	0.47
12/10/23	1.06
12/11/23	0.4
8/21/19	0.1
10/17/22	0.12
10/24/22	0.43
10/31/22	0.1
11/1/22	0.14
11/11/22	1.36
11/15/22	0.32
11/16/22	0.13
11/27/22	0.46

Date	Precipitation (inches)
11/30/22	0.8
12/3/22	0.46
12/6/22	0.68
12/7/22	0.41
12/15/22	0.56
12/16/22	0.37
12/22/22	0.21
12/23/22	0.73
12/31/22	0.34
1/3/23	0.37
1/6/23	0.2
1/12/23	0.31
1/19/23	0.76
1/22/23	0.37
1/23/23	0.28
1/25/23	1.6
1/26/23	0.4
2/17/23	0.1
2/21/23	0.15
2/27/23	0.21
2/28/23	0.22
3/3/23	0.16
3/4/23	0.88
3/10/23	0.28
3/11/23	0.23
3/13/23	0.66
3/14/23	0.34
3/23/23	0.12
3/25/23	0.18

Date	Precipitation (inches)
3/27/23	0.2
4/1/23	0.62
4/22/23	0.77
4/23/23	1.31
4/28/23	0.16
4/29/23	1.69
4/30/23	2
5/2/23	0.22
5/20/23	1.48
6/6/23	0.2
6/12/23	0.1
6/14/23	0.24
7/2/23	0.31
7/3/23	0.1
7/4/23	0.36
7/9/23	1.84
7/10/23	0.17
7/14/23	1.02
7/16/23	0.84
7/18/23	0.24
7/25/23	0.3
7/29/23	0.79
8/4/23	0.22
8/7/23	0.75
8/10/23	0.37
8/12/23	0.77
8/13/23	0.17
8/15/23	1.2
8/16/23	0.1

Date	Precipitation (inches)
8/18/23	1.63
8/24/23	0.41
8/25/23	0.58
8/30/23	0.19
9/8/23	0.22
9/9/23	0.38
9/10/23	0.82
9/13/23	0.83
9/18/23	1.51
9/23/23	0.71

Date	Precipitation (inches)
9/24/23	0.49
9/25/23	0.63
9/28/23	0.48
9/29/23	4.1
9/30/23	0.15
10/6/23	0.2
10/7/23	1.37
10/14/23	0.43
10/20/23	0.59

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For delivery information, visit our website at www.usps.com™

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City, State, ZIP+4®
New York, NY 10007-1266

PS Form 3800, April 2015 PSN 7530-00-000-9007 See Reverse for Instructions

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12/21/2023

Postage and Fees
\$10.21

Postage \$4.00
Certified Mail Fee \$11.35
Certified Mail Restricted Delivery \$4.00
Adult Signature Required \$4.00
Adult Signature Restricted Delivery \$4.00

Services & Fees (check box, add fee)
☐ Return Receipt (hardcopy) \$2.65
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$4.00
☐ Adult Signature Required \$4.00
☐ Adult Signature Restricted Delivery \$4.00

Sent To: Lisa Garcia, EPA Region 2 Admin, EPA
Street and Apt. No.: 210 Broadway
City, State, ZIP+4®: New York, NY 10007-1266

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12/21/2023

Postage and Fees
\$10.21

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Certified Mail Fee \$11.35
Certified Mail Restricted Delivery \$4.00
Adult Signature Required \$4.00
Adult Signature Restricted Delivery \$4.00

Services & Fees (check box, add fee)
☐ Return Receipt (hardcopy) \$2.65
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$4.00
☐ Adult Signature Required \$4.00
☐ Adult Signature Restricted Delivery \$4.00

Sent To: Michael Reppin, Administrator, EPA
Street and Apt. No.: 1200 Pennsylvania Ave. N.W.
City, State, ZIP+4®: Washington, DC 20460

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City, State, ZIP+4®
Albany, NY 12233-1011

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12/21/2023

Postage and Fees
\$10.21

Postage \$4.00
Certified Mail Fee \$11.35
Certified Mail Restricted Delivery \$4.00
Adult Signature Required \$4.00
Adult Signature Restricted Delivery \$4.00

Services & Fees (check box, add fee)
☐ Return Receipt (hardcopy) \$2.65
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$4.00
☐ Adult Signature Required \$4.00
☐ Adult Signature Restricted Delivery \$4.00

Sent To: Basil Sengul, Commissioner, NYS DEC
Street and Apt. No.: 625 Broadway
City, State, ZIP+4®: Albany, NY 12233-1011

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Official Use

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New York, NY 10005

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12/21/2023

Postage and Fees
\$10.21

Postage \$4.00
Certified Mail Fee \$11.35
Certified Mail Restricted Delivery \$4.00
Adult Signature Required \$4.00
Adult Signature Restricted Delivery \$4.00

Services & Fees (check box, add fee)
☐ Return Receipt (hardcopy) \$2.65
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$4.00
☐ Adult Signature Required \$4.00
☐ Adult Signature Restricted Delivery \$4.00

Sent To: Royal Coach Lines, LLC, C/O Corporation
Street and Apt. No.: 28 Liberty Street
City, State, ZIP+4®: New York, NY 10005

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Official Use

City, State, ZIP+4®
Therwood, NY 10754

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12/21/2023

Postage and Fees
\$10.21

Postage \$4.00
Certified Mail Fee \$11.35
Certified Mail Restricted Delivery \$4.00
Adult Signature Required \$4.00
Adult Signature Restricted Delivery \$4.00

Services & Fees (check box, add fee)
☐ Return Receipt (hardcopy) \$2.65
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$4.00
☐ Adult Signature Required \$4.00
☐ Adult Signature Restricted Delivery \$4.00

Sent To: Anthony Dellucchi, Perennial Manager
Street and Apt. No.: 424 Broadway
City, State, ZIP+4®: Therwood, NY 10754

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Official Use

City, State, ZIP+4®
Manlius, NY 13150

PS Form 3800, April 2015 PSN 7530-00-000-9007 See Reverse for Instructions

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12/21/2023

Postage and Fees
\$10.21

Postage \$4.00
Certified Mail Fee \$11.35
Certified Mail Restricted Delivery \$4.00
Adult Signature Required \$4.00
Adult Signature Restricted Delivery \$4.00

Services & Fees (check box, add fee)
☐ Return Receipt (hardcopy) \$2.65
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$4.00
☐ Adult Signature Required \$4.00
☐ Adult Signature Restricted Delivery \$4.00

Sent To: Angel Valencia, Royal Coach Lines
Street and Apt. No.: 51 NY-100
City, State, ZIP+4®: Manlius, NY 13150

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City, State, ZIP+4®
Yonkers, NY 10703

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12/21/2023

Postage and Fees
\$10.21

Postage \$4.00
Certified Mail Fee \$11.35
Certified Mail Restricted Delivery \$4.00
Adult Signature Required \$4.00
Adult Signature Restricted Delivery \$4.00

Services & Fees (check box, add fee)
☐ Return Receipt (hardcopy) \$2.65
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$4.00
☐ Adult Signature Required \$4.00
☐ Adult Signature Restricted Delivery \$4.00

Sent To: Steven DiPablo, President/CEO, Royal Coach Lines
Street and Apt. No.: 1010 Margaret Avenue
City, State, ZIP+4®: Yonkers, NY 10703

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Official Use

City, State, ZIP+4®
Lincolnville, NY 10594

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12/21/2023

Postage and Fees
\$10.21

Postage \$4.00
Certified Mail Fee \$11.35
Certified Mail Restricted Delivery \$4.00
Adult Signature Required \$4.00
Adult Signature Restricted Delivery \$4.00

Services & Fees (check box, add fee)
☐ Return Receipt (hardcopy) \$2.65
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$4.00
☐ Adult Signature Required \$4.00
☐ Adult Signature Restricted Delivery \$4.00

Sent To: Blashevski, Sarah, President, Royal Coach Lines
Street and Apt. No.: 120 Princeton Street
City, State, ZIP+4®: Lincolnville, NY 10594

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Official Use

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Yonkers, NY 10703

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12/21/2023

Postage and Fees
\$10.21

Postage \$4.00
Certified Mail Fee \$11.35
Certified Mail Restricted Delivery \$4.00
Adult Signature Required \$4.00
Adult Signature Restricted Delivery \$4.00

Services & Fees (check box, add fee)
☐ Return Receipt (hardcopy) \$2.65
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$4.00
☐ Adult Signature Required \$4.00
☐ Adult Signature Restricted Delivery \$4.00

Sent To: Steven DiPablo, President/CEO, Royal Coach Lines
Street and Apt. No.: 1010 Margaret Avenue
City, State, ZIP+4®: Yonkers, NY 10703

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Official Use

City, State, ZIP+4®
Elmsted, NY 10523

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12/21/2023

Postage and Fees
\$10.21

Postage \$4.00
Certified Mail Fee \$11.35
Certified Mail Restricted Delivery \$4.00
Adult Signature Required \$4.00
Adult Signature Restricted Delivery \$4.00

Services & Fees (check box, add fee)
☐ Return Receipt (hardcopy) \$2.65
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$4.00
☐ Adult Signature Required \$4.00
☐ Adult Signature Restricted Delivery \$4.00

Sent To: Ed Helene, Royal Coach Lines
Street and Apt. No.: 2260 Sam Mill River Road
City, State, ZIP+4®: Elmsted, NY 10523

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Yonkers, NY 10703

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12/21/2023

Postage and Fees
\$10.21

Postage \$4.00
Certified Mail Fee \$11.35
Certified Mail Restricted Delivery \$4.00
Adult Signature Required \$4.00
Adult Signature Restricted Delivery \$4.00

Services & Fees (check box, add fee)
☐ Return Receipt (hardcopy) \$2.65
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$4.00
☐ Adult Signature Required \$4.00
☐ Adult Signature Restricted Delivery \$4.00

Sent To: Royal Coach Lines, LLC, Royal Coach Lines
Street and Apt. No.: 870 Margaret Avenue
City, State, ZIP+4®: Yonkers, NY 10703

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Official Use

City, State, ZIP+4®
Hartsville, NY 10880

PS Form 3800, April 2015 PSN 7530-00-000-9007 See Reverse for Instructions

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12/21/2023

Postage and Fees
\$10.21

Postage \$4.00
Certified Mail Fee \$11.35
Certified Mail Restricted Delivery \$4.00
Adult Signature Required \$4.00
Adult Signature Restricted Delivery \$4.00

Services & Fees (check box, add fee)
☐ Return Receipt (hardcopy) \$2.65
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$4.00
☐ Adult Signature Required \$4.00
☐ Adult Signature Restricted Delivery \$4.00

Sent To: Heather Ruffolo, Perennial Manager, Royal Coach Lines
Street and Apt. No.: 475 W. Hartsville Ave
City, State, ZIP+4®: Hartsville, NY 10880

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Yonkers NY 10703 OFFICIAL USE

Certified Mail Fee \$4.35

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$3.55
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$0.00
☐ Adult Signature Required \$0.00
☐ Adult Signature Restricted Delivery \$0.00

Postage \$2.31

Total Postage and Fees

\$10.21

Sent To

Ralph Colabellio Jr., VP, Royal Coach Lines

Street and Apt. No., or PO Box No.

1010 Nepperchan Avenue

City, State, ZIP+4®

Yonkers, NY 10703

PS Form 3800, April 2015 PSN 7530-02-000-9047

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12/21/2023

8086 1088 0000 0292 2702



CHURCH STREET
90 CHURCH ST FL 1
NEW YORK, NY 10007-9998
(800)275-8777

12/21/2023

05:42 PM

Product	Qty	Unit Price	Price
First-Class Mail®	1		\$2.31
Large Envelope			
Albany, NY 12233			
Weight: 0 lb 4.90 oz			
Estimated Delivery Date			
Tue 12/26/2023			
Certified Mail®			\$4.35
Tracking #:			
70172620000038019907			
Return Receipt			\$3.55
Tracking #:			
9590 9402 8632 3244 1645 80			
Total			\$10.21
First-Class Mail®	1		\$2.31
Large Envelope			
New York, NY 10007			
Weight: 0 lb 4.90 oz			
Estimated Delivery Date			
Tue 12/26/2023			
Certified Mail®			\$4.35
Tracking #:			
70172620000038019914			
Return Receipt			\$3.55
Tracking #:			
9590 9402 8632 3244 1645 97			
Total			\$10.21
First-Class Mail®	1		\$2.31
Large Envelope			
Washington, DC 20460			
Weight: 0 lb 5.00 oz			
Estimated Delivery Date			
Tue 12/26/2023			
Certified Mail®			\$4.35
Tracking #:			
70172620000038019921			
Return Receipt			\$3.55
Tracking #:			
9590 9402 8632 3244 1646 03			
Total			\$10.21
First-Class Mail®	1		\$2.31
Large Envelope			
Thornwood, NY 10594			
Weight: 0 lb 4.90 oz			
Estimated Delivery Date			
Tue 12/26/2023			
Certified Mail®			\$4.35
Tracking #:			
70172620000038019938			
Return Receipt			\$3.55
Tracking #:			
9590 9402 8577 3244 6295 64			
Total			\$10.21
First-Class Mail®	1		\$2.31
Large Envelope			
Briarcliff Manor, NY 10510			
Weight: 0 lb 4.90 oz			
Estimated Delivery Date			
Tue 12/26/2023			
Certified Mail®			\$4.35
Tracking #:			
70172620000038019945			
Return Receipt			\$3.55
Tracking #:			
9590 9402 8577 3244 6295 71			
Total			\$10.21
First-Class Mail®	1		\$2.31
Large Envelope			
Yonkers, NY 10703			
Weight: 0 lb 4.90 oz			
Estimated Delivery Date			
Tue 12/26/2023			
Certified Mail®			\$4.35
Tracking #:			
70172620000038019969			
Return Receipt			\$3.55
Tracking #:			
9590 9402 8577 3244 6295 95			
Total			\$10.21
First-Class Mail®	1		\$2.31
Large Envelope			
Yonkers, NY 10703			
Weight: 0 lb 4.90 oz			
Estimated Delivery Date			
Tue 12/26/2023			
Certified Mail®			\$4.35
Tracking #:			
70172620000038019976			
Return Receipt			\$3.55
Tracking #:			
9590 9402 8577 3244 6296 01			
Total			\$10.21

First-Class Mail® 1 \$2.31
 Large Envelope
 Elmsford, NY 10523
 Weight: 0 lb 4.90 oz
 Estimated Delivery Date
 Tue 12/26/2023
 Certified Mail® \$4.35
 Tracking #: 70172620000038019952
 Return Receipt \$3.55
 Tracking #: 9590 9402 8577 3244 6295 88
 Total \$10.21

First-Class Mail® 1 \$2.31
 Large Envelope
 Yonkers, NY 10703
 Weight: 0 lb 4.90 oz
 Estimated Delivery Date
 Tue 12/26/2023
 Certified Mail® \$4.35
 Tracking #: 70172620000038019884
 Return Receipt \$3.55
 Tracking #: 9590 9402 8577 3244 6296 32
 Total \$10.21

First-Class Mail® 1 \$2.31
 Large Envelope
 Yonkers, NY 10703
 Weight: 0 lb 4.90 oz
 Estimated Delivery Date
 Tue 12/26/2023
 Certified Mail® \$4.35
 Tracking #: 70172620000030019808
 Return Receipt \$3.55
 Tracking #: 9590 9402 8577 3244 6296 49
 Total \$10.21

First-Class Mail® 1 \$2.31
 Large Envelope
 Hartsdale, NY 10530
 Weight: 0 lb 4.90 oz
 Estimated Delivery Date
 Tue 12/26/2023
 Certified Mail® \$4.35
 Tracking #: 70172620000038019891
 Return Receipt \$3.55
 Tracking #: 9590 9402 8577 3244 6296 25
 Total \$10.21

First-Class Mail® 1 \$2.31
 Large Envelope
 Lindendale, NY 10540
 Weight: 0 lb 4.90 oz
 Estimated Delivery Date
 Tue 12/26/2023
 Certified Mail® \$4.35
 Tracking #: 70172620000038019983
 Return Receipt \$3.55
 Tracking #: 9590 9402 8577 3244 6296 18
 Total \$10.21

First-Class Mail® 1 \$2.31
 Large Envelope
 New York, NY 10005
 Weight: 0 lb 4.90 oz
 Estimated Delivery Date
 Tue 12/26/2023
 Certified Mail® \$4.35
 Tracking #: 70172620000038019877
 Return Receipt \$3.55
 Tracking #: 9590 9402 8577 3244 6296 56
 Total \$10.21

Grand Total: \$132.73

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
■ Print your name and address on the reverse so that we can return the card to you.
■ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Eddie Colone, Terminal Manager
Royal Coach Lines, LLC
Royal Coach Lines, Inc.
2260 Sawmill River Road
Elmsford, NY 10523



9590 9402 8577 3244 6295 88

2. Article Number (Transfer from service label)

7017 2620 0000 3801 9952

PS Form 3811, July 2020 PSN 7530-02-000-9053

RC NOIS

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☒ Agent
B. Received by (Printed Name) ☐ Addressee
C. Date of Delivery 12-27-23
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

1. Article Addressed to:

USGA Garcia, EPA Region 2 Admin.
Environmental Protection Agency
290 Broadway
New York, NY 10007-1866

3. Service Type
☐ Priority Mail Express®
☐ Adult Signature
☐ Registered Mail™
☐ Certified Mail®
☐ Registered Mail Restricted Delivery
☐ Collect on Delivery
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery
☐ Insured Mail (over \$500)

2. Article Number (Transfer from service label)

7017 2620 0000 3801 9914

PS Form 3811, July 2020 PSN 7530-02-000-9053

RC NOIS

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
■ Print your name and address on the reverse so that we can return the card to you.
■ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Royal Coach Lines, LLC
C/O CT Corporation System
28 Liberty Street
New York, NY 10005



9590 9402 8577 3244 6296 56

2. Article Number (Transfer from service label)

7017 2620 0000 3801 9877

PS Form 3811, July 2020 PSN 7530-02-000-9053

RC NOIS

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☒ Agent
B. Received by (Printed Name) ☐ Addressee
C. Date of Delivery
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

DEC 26 2023
BY: VC

3. Service Type
☐ Priority Mail Express®
☐ Adult Signature
☐ Registered Mail™
☐ Certified Mail®
☐ Registered Mail Restricted Delivery
☐ Collect on Delivery
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery
☐ Insured Mail (over \$500)

2. Article Addressed to:

7017 2620 0000 3801 9945

PS Form 3811, July 2020 PSN 7530-02-000-9053

RC NOIS

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
■ Print your name and address on the reverse so that we can return the card to you.
■ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

USGA Garcia, EPA Region 2 Admin.
Environmental Protection Agency
290 Broadway
New York, NY 10007-1866



9590 9402 8632 3244 1645 97

2. Article Number (Transfer from service label)

7017 2620 0000 3801 9914

PS Form 3811, July 2020 PSN 7530-02-000-9053

RC NOIS

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
■ Print your name and address on the reverse so that we can return the card to you.
■ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Angel Valentin, Head Dispatcher
Royal Coach Lines, LLC
Royal Coach Lines, Inc.
51 NY-100
Briarcliff Manor, NY 10510



9590 9402 8577 3244 6295 71

2. Article Number (Transfer from service label)

7017 2620 0000 3801 9945

PS Form 3811, July 2020 PSN 7530-02-000-9053

RC NOIS

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☒ Agent
B. Received by (Printed Name) ☐ Addressee
C. Date of Delivery 12-27-23
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Priority Mail Express®
☐ Adult Signature
☐ Registered Mail™
☐ Certified Mail®
☐ Registered Mail Restricted Delivery
☐ Collect on Delivery
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery
☐ Insured Mail (over \$500)

2. Article Addressed to:

7017 2620 0000 3801 9914

PS Form 3811, July 2020 PSN 7530-02-000-9053

RC NOIS

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☒ Agent
B. Received by (Printed Name) ☐ Addressee
C. Date of Delivery
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

DEC 26 2023
BY: VC

3. Service Type
☐ Priority Mail Express®
☐ Adult Signature
☐ Registered Mail™
☐ Certified Mail®
☐ Registered Mail Restricted Delivery
☐ Collect on Delivery
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery
☐ Insured Mail (over \$500)

2. Article Addressed to:

7017 2620 0000 3801 9945

PS Form 3811, July 2020 PSN 7530-02-000-9053

RC NOIS

Domestic Return Receipt

Scanned with CamScanner

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	COMPLETE THIS SECTION ON DELIVERY
<p>1. Article Addressed to:</p> <p>Basil Seggos, Commissioner New York State Department of Environmental Conservation 625 Broadway ALBANY, NY 12233-1011</p>	<p>A. Signature X</p> <p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	<p>A. Signature</p> <p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>2. Article Number (Transfer from service label)</p> <p>7017 2620 0000 3801 9907</p>	<p>2. Article Number (Transfer from service label)</p> <p>7017 2620 0000 3801 9921</p>	<p>2. Article Number (Transfer from service label)</p> <p>7017 2620 0000 3801 9921</p>
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Blasina Silva, Safety Director
(or current manager/director)
Royal Coach Lines, LLC
120 Primrose Street, Katonah
Litchfield, NY 10544

9590 9402 8577 3244 6296 18

2. Article Number (transfer from service label)

7017 2620 0000 3801 9983

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature John Brasna ☒ Agent ☐ Addressee

B. Received by Printed Name John Brasna C. Date of Delivery 12/27/23

D. Is delivery address different from item 1? ☒ Yes ☐ No
If YES, enter delivery address below: 64N DASHA

DEC 27 2023

3. Service Type

☒ Adult Signature ☐ Priority Mail Express®

☒ Adult Signature Restricted Delivery ☐ Registered Mail™

☐ Certified Mail® ☐ Registered Mail Restricted

☐ Certified Mail Restricted Delivery ☐ Signature Confirmation™

☐ Collect on Delivery ☐ Signature Confirmation Restricted Delivery

☐ Insured Mail ☐ Insured Mail Restricted Delivery over \$500

Domestic Return Receipt

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